

# UNITED STATES DISTRICT COURT

for the

Western District of Michigan

United States of America

v.

Adam Fox, Barry Croft, Ty Garbin, Kaleb Franks,  
Daniel Harris and Brandon Caserta

Case No.

1:20-mj-416

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2020 to the present in the county of Kent and elsewhere in the  
Western District of Michigan, the defendant(s) violated:

*Code Section*

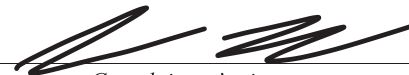
18 U.S.C. § 1201(c)

*Offense Description*

Conspiracy to commit kidnapping

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



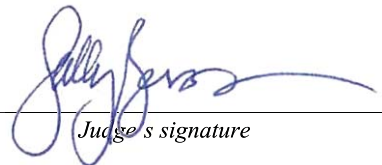
*Complainant's signature*

RICHARD TRASK, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: October 6, 2020



*Judge's signature*

City and state: Grand Rapids, Michigan

Sally J. Berens, U.S. Magistrate Judge

*Printed name and title*